## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

TERA A. MCMILLIAN,	
Plaintiff,	) ) )     CASE NO. 2:07-CV-01-WKW
•	) CASE NO. 2.07-6 V-01-WKW )
ALABAMA DEPARTMENT OF YOUTH	, )
SERVICES and	)
MICHAEL J. HARDY,	)
	)
Defendants.	)

## **DEFENFDANT MICHAEL J. HARDY'S PROPOSED VOIR DIRE QUESTIONS**

COMES NOW DEFENDANT, Michael J. Hardy, and in accordance with the Court's Pre Trial Order, respectfully files his Proposed Voir Dire Qustions, to be asked in addition to the Court's standard questions qualifying the proposed jury, to wit:

- 1. Is anyone employed by ANY federal (including the military) or state agency? If so, which agency? In what capacity? How long?
- 2. Has anyone ever filed a sexual harassment or sexual assault charge against anyone? If so, please explain the general details? What was the result of the charges?
- 3. Has anyone ever been accused of sexual harassment or sexual assault? If so, please explain the general details.
- 4. Has anyone ever had a sexual harassment or sexual assault charge filed against them, anyone in their family, or a close friend or acquaintance? If so, please give the general details? What was the result of the charges?

- 5. Does anyone believe that just because someone is charged with sexual harassment, they are automatically guilty?
- 6. Is anyone a member of a social fraternity or sorority? If so, which one (s)?
- 7. Is anyone a member or a supporter of a Women's rights organization, such as the National Organization of Woman, etc?

Respectfully submitted, this the 14th day of July, 2008.

s/ JAMES ELDON WILSON James Eldon Wilson (WIL079) **Deputy Attorney General Attorney For Michael Hardy** 

**OF COUNSEL:** James Eldon Wilson, Esquire 4265 Lomac Street Montgomery, AL 36106 (334) 409-2003; FAX (334) 409-2009 email:jameseldonwilson@mindspring.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on July 14, 2008, I electronically filed the foregoing Defendant Michael J. Hardy's Proposed Voir Dire Questions with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jimmy Jacobs, Esq. **Attorney for the Plaintiff** 4137 Carmichael Rd, Ste 100 Montgomery, AL 36106

T. Dudley Perry, Jr. Deputy Attorney General
Attorney for the Defendants
Alabama Department of Youth Services P.O. Box 66 Mt. Meigs, AL 36057

> s/JAMES ELDON WILSON Of Counsel